Aubrey F. Hammond, Jr., VSB# 28256 16 North 8<sup>th</sup> Street, First Floor Richmond, VA 23219 (804)644-2546 Counsel for Debtor(s)

# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA Richmond Division

IN RE: OLIVER LAWRENCE,

**Debtor** 

Case No. 17-30339-KRH

Chapter 7

### MOTION TO WITHDRAW AS COUNSEL

NOW COMES Aubrey F. Hammond, Jr., counsel for the Debtor, Oliver Lawrence, and requests permission to withdraw as counsel for the Debtor. In support of which Counsel states that Debtor has not provided Counsel with information pertinent to this case and thus Counsel is impaired in his ability to represent the Debtor. Additionally, Counsel believes that Debtor should retain an experienced trial attorney given the litigation matters that may arise in this case.

WHEREFORE, Aubrey F. Hammond, Jr. respectfully requests that he be allowed to withdraw as counsel for the Debtor.

# RESPECTFULLY SUBMITTED AUBREY F. HAMMOND, JR.

By: /s/ Aubrey F. Hammond, Jr. Attorney for Debtor(s)

### PROOF OF SERVICE

I hereby certify that on the 29th day of March, 2017, I mailed, with first class postage prepaid, a true copy of this Motion to all parties on the attached list.

/s/ Aubrey F. Hammond, Jr. Aubrey F. Hammond, Jr.

Aubrey F. Hammond, Jr., (VSB # 28256) 16 North 8th Street, First Floor Richmond, VA 23219 Case 17-30339-KRH Doc 38 Filed 03/29/17 Entered 03/29/17 16:47:53 Desc Main Document Page 2 of 6

(804) 644-2546 Counsel for the Debtor

# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

IN RE: OLIVER LAWRENCE, Debtor(s)

Case No. 17-30339-KRH Chapter 7

# NOTICE OF MOTION AND NOTICE OF HEARING

The Debtor has filed papers with the court to withdraw as counsel of record.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then you or your attorney must file a response with the Clerk's Office, U.S. Bankruptcy Court, 701 E. Broad Street, Richmond, VA 23219 within 14 days of the date of the service of this Notice.

If you mail your objection to the Court for filing, you must mail it early enough so that the Court will receive it on or before the date stated above. You must also mail a copy to the attorney for the debtor and to the Chapter 13 Trustee:

Address of attorney for the debtors: Aubrey F. Hammond, Jr.

16 North 8<sup>th</sup> Street, First Floor Richmond, VA 23219

(804) 644-2546

Attend a hearing scheduled for April 19 at 12:00 p.m. at the U.S. Bankruptcy Court, 701 East Broad Street, Courtroom 5000, Richmond, VA 23219. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Motion and may enter an order granting the relief requested

Date: March 29, 2017

/s/ Aubrey F. Hammond, Jr.
Aubrey F. Hammond, Jr., VSB# 28256
16 North 8<sup>th</sup> Street, First Floor
Richmond, VA 23219

### PROOF OF SERVICE

The undersigned hereby certifies that on the 29<sup>th</sup> day of March, 2017, the foregoing Notice was served upon the standing trustee, all creditors, and other interested parties by electronic means

or by mailing a complete copy of the Notice to each party, by first-class mail.

## /s/ Aubrey F. Hammond, Jr.

#### Service Matrix:

1901 1905 Whitcomb Street LLC c/o Leclair Ryan 919 E. Main Street Richmond, VA 23219-0000

8409 Staples Mill Rd LLC c/o Christopher L. Perkins, Esq 951 E. Byrd Street, #8 Richmond, VA 23219-0000

Alfred Winfield c/o Chris Bernhardt, Esq. 951 E. Byrd St., East Tower Richmond, VA 23219-0000

AllianceOne PO Box 3102 Southeastern, PA 19398-0000

Alvina E. L. Manuel 4911 Wood Thrush Cir Apt. 101 Henrico, VA 23231-0000

American Express PO Box 981537 Attn: Bankruptcy Dept. El Paso, TX 79998-0000

Banita Saffore 5600 Crenshaw Road Richmond, VA 23227-0000

Barclays Bank Delaware 125 S. West Street Wilmington, DE 19801-5014

Beach Receivables Company, LLC c/o Charles A. Gavin 1409 Eastridge Rd Henrico, VA 23229-0000

Capital One Bank P.O. Box 71083 Attn: Bankruptcy Dept. Charlotte, NC 28272-0000

Carl M. Bates Chapter 13 Trustee P.O. Box 1819 Richmond, VA 23218-0000

Caudle & Caudle, PC 3123 W. Broad Street Richmond, VA 23230-0000

> Cavalier Telephone PO Box 11146 Richmond, VA 23230-0000

Citibank South Dakota NA c/o Glasser and Glasser PO Box 3400 Norfolk, VA 23510-0000

City of Richmond Div. of Tax Collection P.O. Box 26624 Richmond, VA 23261-0000

City of Richmond Dept. of Public Utilities 900 E. Broad Street Richmond, VA 23219-0000

City of Richmond 600 East Broad Street Attn: Dept. of Economic Dev. Richmond, VA 23219-0000

Credit One P.O. Box 625

Attn: Bankruptcy Dept. Metairie, LA 70004-0000

Deutsche Bank Trust Co Tr c/o Nolan Miroz & McCormick 2301 Gallows Road, Ste.200 Dunn Loring, VA 22027-0000

Fireman's Fund Insurance Co. c/o Eliades Law Firm PLLC 731 W. Broadway MS 38600-0000

First Data Global Leasing c/o American Infosource LP PO Box 248838 Oklahoma City, OK 73124-8838

Focused Recovery Solutions 9701 Metropolitan Court Suite B Richmond, VA 23236-0000

Fox Head Homeowners Assn c/o Solodar and Solodar 11504 Allecingie Pkwy #100 Richmond, VA 23235-0000

Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7346

Ivon M. Gomez 4200 Balmoral Avenue Henrico, VA 23228-0000

Jameka Hill 100 Ruth Harris Way Hopewell, VA 23860-0000

Jose A. Juarez

4119 Townhouse Road # J Henrico, VA 23228-0000

Kiesha R. Martin c/o Hull Street Law 1010 Hull Street Richmond, VA 23224-0000

> Luis F. Huerta 9210 Greenford Dr Henrico, VA 23294-0000

First Capital Bank

c/o J. P. McGuire Boyd, Jr.,

200 South 10th Street

Richmond, VA 23219-0000

Luis Francisco Huerta, et al

c/o Robert F. Redmond, Jr. Esq

PO Box 1320

Richmond, VA 23218-0000

Luis M. Gomez 4507 Watchspring Drive Richmond, VA 23234-0000

Maynor M. M. Bonilla 418 Melmark Court Richmond, VA 23225-0000

Napa Genuine Parts Company 1601 Chamberlayne Avenue Richmond, VA 23222-0000

Office of the U.S. Trustee 701 East Broad Street Suite 4304 Richmond, VA 23219-1885

Petersburg Commonwealth Att. 150 N. Sycamore Street Petersburg, VA 23803-0000

Petersburg GDC 35 E. Tabb Street Petersburg, VA 23803-0000

Queen Harris c/o Thomas D. Domonoske, Esq 763 J. Clyde Morris Blvd, #1A Newport News, VA 23606-0000

Queen Harris c/o Dale W. Pittman, Esq 112-A W. Tabb St Petersburg, VA 23803-0000

Rena Maldonado 2429 Vandover Rd Henrico, VA 23229-0000

Ricky Jones 3035 Montrose Avenue Richmond, VA 23222-0000

Rosa Yesenia Miranda 3303 Fox Chase Drive Midlothian, VA 23112-0000

Sherman Hubert Company, LLC c/o Charles Gavin 1409 Eastridge Road Henrico, VA 23229-0000

Somers M. Wilton Real Estate c/o Duane Deskevich 1409 Eastridge Road Henrico, VA 23229-0000

StanCorp Mortgage Investors 19225 NW Tanasbourne Drive 3rd Floor Hillsboro, OR 97124-0000 Tammy Quick 3321 2nd Avenue Richmond, VA 23222-0000

Towne Bank 6001 Harbour View Blvd Suffolk, VA 23435-0000

VA Department of Taxation P.O. Box 1115 Attn: Bankruptcy Dept. Richmond, VA 23218-0000

Village Bank c/o Erin Kessell, Esq. PO Box 1555 Richmond, VA 23218-0000

Virginia Eye Institute 400 Westhampton Station Richmond, VA 23226-0000

Wayne Spencer c/o Rothenberg Streeter 3412 Cutshaw Avenue Richmond, VA 23230-0000

Yvette Taylor 1214 Claiborne Street Richmond, VA 23220-0000

Yvonne Taylor 2542 Whitcomb Street Richmond, VA 23223-0000